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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 MEDIA CHAIN, LLC,

12 Plaintiff,

13 v.

14 ROKU, INC.,

15 Defendant.
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Case No. 3:21-cv-09528-EMC

**NOTICE OF MOTION AND MOTION
TO WITHDRAW AS COUNSEL FOR
PLAINTIFF; [PROPOSED] ORDER
GRANTING MOTION TO WITHDRAW**

The Honorable Judge Edward M. Chen

**UNOPPOSED MORGAN & MORGAN, P.A. AND THE BRICKELL IP GROUP, PLLC'S
NOTICE OF MOTION AND MOTION TO WITHDRAW AS COUNSEL FOR
PLAINTIFF; [PROPOSED] ORDER GRANTING MOTION TO WITHDRAW**

The undersigned counsel, William B. Lewis, Esq., Arletys Hernandez, Esq., Michael Ram, Esq., Arthur Robert Weaver, Esq. and the law firms of Morgan & Morgan, P.A. and the Brickell IP Group, PLLC (collectively, "Counsel")¹, pursuant to Local Rule 11-5(a), respectfully move to withdraw as counsel of record and counsel *pro hac vice* for Plaintiff, MEDIA CHAIN, LLC ("Plaintiff"), and in support thereof state as follows:

1. Irreconcilable differences have arisen between Counsel and Plaintiff that require Counsel to withdraw their representation of Plaintiff in this matter pursuant to the Rules Regulating the Florida Bar and Rule 3-700 of the California Rules of Professional Conduct.

2. Counsel certifies that the undersigned has advised corporate Plaintiff that federal law requires that a corporation cannot appear *pro se* and must be represented by counsel. Plaintiff is actively seeking alternative representation.

3. This action was just transferred to this division from the Western District of Texas on December 7, 2021. The only pending deadline for the parties is on March 8, 2022, requiring the parties file a Case Management Report in advance of a March 15, 2022, Case Management Conference. Counsel's withdrawal will not prejudice the parties and will allow Plaintiff ample time to seek alternate representation.

4. Counsel notified Plaintiff of their withdrawal in writing on January 7, 2022. Plaintiff consents to Counsel's withdrawal. Counsel requests that any and all documents be

¹ This matter was initiated in the Western District of Texas on January 8, 2021.[DE 1]. Arletys Hernandez, William B. Lewis, and Arthur Robert Weaver were admitted *pro hac vice* on Plaintiff's behalf. [DE 39-40; 45.] Pursuant to Defendant's Motion to Transfer, this matter was transferred to this Court on December 7, 2021. [DE 65.] Local counsel, Michael Ram, appeared in this matter on December 14, 2021. As of the date of this Motion, Ms. Hernandez and Messrs. Lewis and Weaver were in the process of appearing *pro hac vice* in this division.

forwarded to the attention of Media Chain, LLC, c/o Chris Estes, email:
chris@mediachainllc.com.

5. Counsel, on behalf of Plaintiff, request that the Court grant Plaintiff forty-five (45) days from an order granting this Motion, to obtain new counsel.

6. Defendant does not oppose this motion.

7. Given the insubstantial nature of this Motion, as well as the substantial burden to all parties in travelling and attending a hearing on this Motion, Counsel respectfully requests that the Court waive oral argument.

8. This motion is not filed for purpose of, and the relief sought will not result in, undue delay or prejudice to any party.

WHEREFORE, for the reasons stated, Counsel respectfully requests that the Court enter an order discharging Counsel, William B. Lewis, Esq., Arletys Hernandez, Esq., Michael Ram, Esq., Arthur Robert Weaver, Esq. and the law firms of Morgan & Morgan, P.A. and the Brickell IP Group, PLLC as attorney of record for Plaintiff, Media Chain, LLC.

Dated: January 10, 2022

Respectfully submitted,

MORGAN & MORGAN, P.A.

By: /s/ Michael Ram

Michael Ram

Michael F. Ram (CA Bar No. 104805)
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And,

The Brickell IP Group, PLLC

By: /s/Arthur Robert Weaver

Arthur Robert Weaver, Esq.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on January 10, 2022, I electronically filed the foregoing with the Clerk of the Court and served it on Plaintiff, Media Chain, LLC c/o Chris Estes and on all counsel of record using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

By: /s/ Michael Ram

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

MEDIA CHAIN, LLC,

Plaintiff,

v.

ROKU, INC.,

Defendant.

Case No. 1:21-cv-009528-AGT

[PROPOSED] ORDER GRANTING
MOTION TO WITHDRAW
AS COUNSEL FOR PLAINTIFF

**[PROPOSED] ORDER GRANTING MOTION TO WITHDRAW
AS COUNSEL FOR PLAINTIFF**

William B. Lewis, Esq., Arletys Hernandez, Esq., Michael Ram, Esq., Arthur Robert Weaver, Esq. and the law firms of Morgan & Morgan, P.A. and the Brickell IP Group, PLLC (collectively, "Counsel"), seek to withdraw as counsel and counsel *pro hac vice* for Plaintiff in the above-captioned litigation pursuant to Local R. 11-5(a) and Cal. R. Prof. conduct 3-700. As this Court finds that Counsel has submitted satisfactory reasoning for withdrawal, and that the granting of his Motion will not cause substantial prejudice or delay to any party.

IT IS HEREBY ORDERED that William B. Lewis, Esq., Arletys Hernandez, Esq., Michael Ram, Esq., Arthur Robert Weaver, Esq. and the law firms of Morgan & Morgan, P.A. and the Brickell IP Group, PLLC is GRANTED, and Counsel is hereby terminated as counsel *pro hac vice* in this proceeding.

DATED: _____

By: _____
Hon. Edward M. Chen
United States District Court